LIMITED SOURCES JUSTIFICATION/FEDERAL SUPPLY SCHEDULES

- 1. The National Aeronautics and Space Administration/Goddard Space Flight Center (NASA/GSFC) proposes to extend the current Task Order# NNG12FC80T with Genesis Engineering Solution (GES) in support of the James Webb Space Telescope (JWST). This document justifies the determination for restricting consideration of schedule contractors to fewer than required in Federal Acquisition Regulation (FAR) 8.405-6, Limiting Sources. The extension is being conducted under the authority of the Multiple Award Schedule Program.
- 2. Nature and/or description: NASA/GSFC proposes to extend the task order with GES for an additional 3 months. This extension will provide adequate time to establish a follow-on procurement in order to continue to support the JWST Engineering Support requirement. This 3-month extension will support continued design, development and implementation of the Beam Image Analyzer (BIA) for Optical Telescope and Integrated Science Instrument Module (OTIS) testing. Market research and acquisition planning for the follow-on procurement has been delayed due to the number of actions currently being worked by the JWST acquisition team, thus this 3-month extension is necessary.
- 3. Description of Supplies or Services: The products required include engineering hardware and services essential to thermal-optical verification of the JWST Observatory. This involves demonstration and/or verification of thermal requirements and performance, and design, development and implementation of special test equipment and surrogate hardware. Specifically, the contractor shall deliver and support the use of a BIA for the OTIS test campaign at NASA's Johnson Space Center (JSC), including related activities such as test configuration, planning, and data analysis, and also supply engineering support services, including relevant documentation.

Under the current order, GES designed, developed and delivered the BIA and supported OTIS testing at GSFC. The follow-on requirement will be for the development of an additional BIA and support of OTIS testing at JSC. During this 3-month extension period, GES will be procuring the long-lead items (thermal vacuum shrouds, photometry cameras, etc.) necessary for the test campaign at JSC.

The estimated value of the 3-month extension is [text deleted].

4. Authority and supporting rationale. The authority for this extension is FAR 8.405-6 (a)(1)(i)(B), only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.

Design, development and implementation of the BIA for OTIS testing at JSC requires a contractor with detailed knowledge and experience with the current BIA, as well as familiarity and experience with the Optical Telescope Element (OTE) Simulator (OSIM) and interfaces within and among the OTE, Integrated Science Instrument Module (ISIM), Sunshield, Spacecraft, and Cryocooler. Only GES can credibly satisfy these criteria because the company designed and built the existing BIA, and thus possesses specialized knowledge and skills that are not easily or practicably transferrable to another party. The existing BIA is the master optical verification tool used to align the OSIM during the ISIM cryovacuum (CV) test series campaign (CV1-Risk Reduction, CV2 and CV3); OSIM will be used to verify the ISIM instruments as the diagnostic sensors that will in turn verify the OTE during testing of OTIS. The prelude to flight OTIS testing at JSC involves three tests: Optical Ground Support Equipment (OGSE) test #1 (OGSE1), OGSE2, and the Thermal Pathfinder. An additional BIA will be required during OGSE1 and OGSE2. GES is uniquely qualified technically to provide another BIA and associated engineering support associated with OGSE1 and OGSE2, as well as interpreting plans for and results from Thermal Pathfinder and the flight OTIS test itself, as they relate to BIA design and performance.

5. Best value determination: Contracting with GES represents the lowest cost and lowest risk option and provides the best value for the Government. The hardware development schedule associated with OTIS testing and related work is very tight. Planned test hardware development must be accomplished per the current schedule to avoid observatory critical path delays and consequent cost impacts that could violate the JWST Program Commitment Agreement (PCA). Example: deliver the BIA to JSC in January 2015. GES's performance on the current GSA contract demonstrates that GES will support the JWST project's challenging schedule. Moreover, pursuing this 3-month extension reduces cost to the Government by avoiding additional pass-through fees, enabling more efficient communication and direction versus an approach wherein GES is a subcontractor on an existing support service contract.

It is anticipated that the work under this order will be performed at hourly rates. GSA has already determined the hourly rates under Federal Supply Schedule contracts to be fair and reasonable. Additionally, the government will ask for additional discounts in accordance with FAR 8.405-4. These combined efforts will result in the government receiving the best value (as defined in FAR 2.101) and the lowest overall cost alternative to meet the government's need.

6. Market research: Market research gathered was based on the results of the two previous competitions to award this requirement.

The first requirement was competed in October 2010, but only one vendor, GES, showed interest.

The second requirement was competed in November 2011, with only two vendors bidding, GES and Vigyan. Vigyan's offer was found to be technically deficient and was not selected to meet the Government requirements.

- 7. Other facts supporting use of limited sources: In addition to the facts above, contracting with GES, which has the requisite knowledge and experience to perform the work, not only mitigates schedule risk but also eliminates the additional non-recurring expenditures of time and money that would be necessary with another entity (even if it were practical). Moreover, GES designed and built the existing BIA and thus possesses specialized knowledge and skills that are not easily or practicably transferrable to another party.
- 8. Actions to overcome barriers to competition: There are currently no efforts to overcome barriers to competition in future acquisitions as every possible effort has been made to include all schedule holders under the Federal Supply Schedule. Any subsequent acquisition for these services will be given the same level of analysis as the current schedule holders, since the products and services they provide can change over time.

Technical Officer:	I certify that the facts presented in this justification are accurate and complete.	
	Paul Geithner, Deputy Project Manager-Technical	Date
Contracting Officer:	I hereby determine that the anticipated cost to the Government will be fair and reasonable and certify that this justification is accurate and complete to the best of my knowledge and belief.	
	Felipe P. Romo, Contracting Officer	Date
Procurement Officer:	I certify that this justification is accurate and complete to the knowledge and belief.	e best of my
	Michael E. McGrath, Procurement Officer	Date
GSFC Competition Advocate:	In accordance with FAR 8.405-6(d) (2), I approve this justification as accurate and complete to the best of my knowledge and belief.	
	Rick Obenschain, GSFC Competition Advocate	Date